

ACT 64 INSPECTION REPORT

U.S. EPA I.D. NUMBER M 1 D 0 2 1 7 3 8 4 3 1
(or Michigan)

FACILITY NAME Rouge Steel Co.
3001 Miller Rd.
P.O. Box 1699
DEARBORN CITY MICHIGAN 48121 ZIP CODE

DATE 3/30/87 TIME OF INSPECTION (FROM) 9:00 (TO) 2:00

PERSON(S) INTERVIEWED	TITLE	TELEPHONE
<u>STEVEN LARSEN</u>	<u>Environmental Engineer</u>	<u>323-1260</u>

INSPECTOR(S)	AGENCY/TITLE	TELEPHONE
<u>LYNNE KING</u>	<u>MDNR/ HAZARDOUS WASTE</u>	<u>344-4670</u>
<u>DARIA DEJANTIER</u>	<u>MDNR/ HAZARDOUS WASTE</u>	<u>344-4670</u>

Primary Business of this Facility: _____

Reason for Inspection: _____
☒ Routine ☐ Follow-up ☐ Complaint

INSPECTION FORMS:

Based upon the inspection, this facility:
☐ is a non-generator/conditionally exempt small quantity generator
☐ small quantity generator
☒ generator
☐ transporter
☒ treatment/storage/disposal facility

FORM
A
A
B
C
D

Date of Last Inspection MARCH 14, 1986

PLANT OPERATIONS

The Rouge Steel Company is involved in the production and processing of steel and resulting by-products. As a result of these activities and the waste products produced, the facility is classified as a Generator of Hazardous Wastes and is subject to the regulations of 40 CFR 262, 40 CFR 264, and 265.

Treatment Storage and Disposal

Hazardous wastes generated at this facility and their corresponding waste code numbers are as follows:

- ~~X~~ Coke oven drip water (D003) - regulated under 40 CFR 261.23 (a) (5) due to the presence of cyanide and sulfide.
- ~~X~~ Final cooler water (D003) - regulated under 40 CFR 261.23 (a) (5) due to the concentration of cyanide and sulfide.
- ~~X~~ Coke oven tar sludge (K087) - regulated under 40 CFR 261.23 (a) (5)
- ~~X~~ Light oil Muck (D003) - regulated under 40 CFR 261.23 (a) (5) due to cyanide.
- Waste halogenated solvents (F001) - listed as hazardous in 40 CFR 261.31; 1, 1, 1-trichloroethane from vapor degreasing and methylene chloride from dip degreasing.
- Electric arc furnace dust (K061) - listed under 40 CFR 261.32 because of the potential presence of chromium, lead, and cadmium. (2 loads/day)
- + - Waste pickle liquor (K062) - listed under 40 CFR 261.32 because of the possible presence of chromium and lead.
- Waste mineral spirits (D001) - combustible material from parts washers; serviced by Safety Kleen. Mineral spirits are reprocessed by Safety Kleen per 40 CFR 265.

On-site disposal of final cooler water occurs through deep-well injection. This portion of the facility is regulated under 40 CFR 265.430. All of the other wastes are transported off-site for disposal.

+ Presently used as a commercial substitute in municipal waste water treatment plants.

~~X related to coke oven~~ - *Shendles*

INSPECTION FORM D
Part 6 of Rules
P.A. 64 of 1979

TREATMENT, STORAGE, DISPOSAL FACILITY

This Facility:

- ☒ Generates Hazardous Waste (Also use Generator Appendix)
- ☐ Treats Hazardous Waste
- ☒ Stores Hazardous Waste
- ☐ Disposes of Hazardous Waste
- ☐ Transports Hazardous Waste (Also use Form C)

This Facility:

- ☐ Accepts wastes from off-site sources
- ☒ Handles only its own wastes

If applicable, hazardous waste is stored in the following:

- ☒ Drums (Containers)
- ☒ Above-ground tanks
- ☐ Underground tanks
- ☐ Waste piles
- ☒ Lagoons (EPA definition)
- ☐ Other
- ☐ Not applicable

If applicable, hazardous wastes are treated/disposed in the following:
(Attach appropriate checklist)

- ☐ Surface Impoundments
- ☐ Waste piles
- ☐ Land Treatment
- ☐ Landfills
- ☐ Incineration/Thermal Treatment
- ☐ Chemical, Physical and Biological Treatment
- ☐ Above-ground tanks

INSPECTION D

____ Underground tanks

____ Drums

____ Other

____ Not applicable

WASTE STREAMS

Hazardous Waste

Code/Name

Source

Type
of Storage

How Much

_____	<u>See attached list from company</u>	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

INSPECTION FORM D
Part 6 Rules
P.A. 64 of 1979

HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITY
Applies to Those Facilities That Do Not Have an Act 64 Permit

General Facility Standards
Rule 601, 40 CFR 265, Subpart B

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Violation Class</u>
1. <u>If required</u> , have the following been notified:				
a.) Notified Director of receipt of hazardous waste from a foreign source? 265.12(a)	—	—	✓	II
b.) Notified Director of change of owner or operator. 40 CFR Part 270. 265.12(b)	—	✓	—	II

Comments: no changes to ownership - no hazardous waste coming into site

2. General Waste Analysis: 265.13

a.) Has the owner or operator obtained a detailed chemical and physical analysis of the waste? 265.13(a)	✓	—	—	I
b.) Does the owner or operator have a detailed waste analysis plan on file at the facility? 265.13(b)	—	✓	—	I
c.) Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site? 265.13(c)	—	—	✓	I

Comments: generally annually - log kept on track

INSPECTION FORM D

	Yes	No	N/A	Violation Class
--	-----	----	-----	-----------------

3. Security - If applicable, do security measures include:

- | | | | | |
|---|-------------------------------------|-------------------------------------|--------------------------|---|
| a.) 24-hour surveillance? 265.14(b)(1) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | I |
| or | | | | |
| b.) i. Artificial or natural barrier around facility? 265.14(b)(2)(i) | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | I |
| and | | | | |
| ii. Controlled entry? 265.14(b)(2)(ii) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | I |
| c.) Danger sign(s) at entrance? 265.14(c) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | I |

Comments: _____

4. Owner or operator inspections: 265.15*

- | | | | | |
|--|-------------------------------------|--------------------------|--------------------------|-------------|
| a.) Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors, and discharges of hazardous waste that may affect human health or the environment? 265.15(a) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | II |
| b.) Does the owner or operator have a written inspection schedule at the facility? 265.15(b)(1) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | II |
| c.) If so, does the schedule address the inspection of the following items: | | | | |
| i. Monitoring equipment? 265.15(b)(1) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | II Safety |
| ii. Safety and emergency equipment? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | II Security |
| iii. Security devices? 265.15(b)(1) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | II |
| iv. Operating and structural equipment (i.e. dikes, pumps, etc.)? 265.15(b)(1) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | II |

* These violations are Class II, unless observations of hazardous conditions or violations are noted in the log and not corrected which result in the release or actual harm to the environment or human health; in such instances violations are Class I.

INSPECTION FORM D

Violation
Class

Yes

No

N/A

Class

- v. Type of problems to be looked for during the inspection (e.g. leaky fitting, defective pump, etc.)? ✓ II
- vi. inspection frequency (based upon the possible deterioration rate of the equipment)? 265.15(b)(4) ✓ II
- d.) Are areas subject to spills inspected daily when in use? 265.15(b)(4) ✓ II
- e.) Does the owner or operator maintain an inspection log or summary of owner or operator inspections? ✓ II
- f.) Does the inspection log contain the following information: 265.15(d)
- i. The date and time of the inspection? 265.15(d) ✓ II
- ii. The name of the inspector? 265.15(d) ✓ II
- iii. A notation of the observations made? 265.15(d) ✓ II
- iv. The date and nature of any repairs or remedial actions? 265.15(d) ✓ II

Comments: doesn't describe what to look for - IV - no name noted
Revised. (person inspection same from coke operation not dated
and/or signed) - repairs made will not tied up now next
inspection. (company has said inspection reports (visual)
would meet requirements of CV.

5. Do personnel training records include: 265.16

- a.) Job titles? 265.16(d)(1) ✓ I
- b.) Job descriptions? 265(d)(2) ✓ I
- c.) Description of training? 265.16(d)(3) ✓ I

INSPECTION FORM D

Yes	No	N/A	Violation Class
-----	----	-----	-----------------

d.) Records of training?
265.16(d)(4)

✓	—	—	II
---	---	---	----

e.) Do new personnel receive re-
quired training within six
months? 265.16(d)

✓*	—	—	I
----	---	---	---

f.) Do personnel training records
indicate that personnel have
taken part in an annual review
of training? 264.16(c)

✓	—	—	I
---	---	---	---

Comments: Training ongoing → began in November still
doing make-ups - planning video for new transfers
company feels job descriptions to numerous & complex
to do.

6. If required, are the following special
requirements for ignitable, reactive, or
incompatible wastes addresses?
265.17

—	—	✓	I
---	---	---	---

a.) Special handling? 265.17(a)

—	—	✓	I
---	---	---	---

b.) No smoking signs? 265.17(a)

—	—	✓	I
---	---	---	---

c.) Separation and protection from
ignition sources? 265.17(a)

—	—	—	I
---	---	---	---

Comments: _____

PREPAREDNESS AND PREVENTION
Rule 606, 40 CFR 265, Subpart C

1. Is there any evidence of fire, explosion,
or release of hazardous waste or hazard-
ous waste constituents 40 CFR Rule 265.31

—	—	—	I
---	---	---	---

Comments: Kest area removed - weather condition's made
condition of Rd difficult to determine. pad unexcavated - actually
old company Building foundation.

INSPECTION FORM D

Yes	No	N/A	Violation Class
-----	----	-----	-----------------

2. If required, does this facility have the following equipment: 40 CFR 265.32

- | | | | | |
|--|---|---|---|---|
| a.) Internal communications or alarm systems. 40 CFR 265.32(a) | ✓ | — | — | I |
| b.) Telephone or 2-way radios at the scene of operations. 40 CFR 265.32(b) | ✓ | — | — | I |
| c.) Portable fire extinguishers, fire control, spill control equipment and decontamination equipment. 40 CFR 265.32(c) | ✓ | — | — | I |
| d.) Indicate the volume of water and/or foam available for fire control. | | | | |

like a city water
Committee / day - River

Comments:

fire alarm, phone, radio

3. Testing and Maintenance of Emergency Equipment: 265.33

Safety

- | | | | | |
|---|---|---|---|---|
| a.) Has the owner or operator established testing and maintenance procedures for emergency equipment? 265.33 | ✓ | — | — | — |
| b.) Is emergency equipment maintained in operable condition? 265.33 | ✓ | — | — | — |
| c.) <u>If required</u> , has owner or operator provided immediate access to internal alarms? 40CFR 265.34(a) | ✓ | — | — | — |
| d.) Is there adequate aisle space for unobstructed movement for personnel and emergency equipment. 40 CFR 265.35. | ✓ | — | — | I |

INSPECTION FORM D

Yes	No	N/A	Violation Class
-----	----	-----	-----------------

Comments: Safety conduct inspection of safety equipment
appear and every 4-5 weeks.

4. Has the owner or operator attempted to make arrangements with local authorities in case of emergencies. 40 CFR 265.37

II

Comments: _____

CONTINGENCY PLAN AND EMERGENCY PROCEDURES
 Rule 607, 40 CFR 265 Subpart D.

1. Does the contingency plan contain the following information:

- a.) The actions facility personnel must take to comply with 265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention Control and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (As applicable). 265.52(a)

I

- b.) Arrangements or attempts to make arrangements agreed to by local police departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to 40 CFR 265.52(c) 265.37

II

- c.) Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator. 40 CFR 265.52(d)

II

INSPECTION FORM D

Yes	No	N/A	Violation Class
-----	----	-----	-----------------

- | | | | | |
|--|---|---|---|----|
| d.) A list of all emergency equipment at the facility which includes the location and physical description of each item on the list, and a brief outline of its capabilities. 40 CFR 265.52(e) | / | — | — | II |
| e.) An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes and alternate evacuation routes.) 40 CFR 265.52(f) | / | — | — | II |
| f.) Is the facility emergency coordinator identified. 40 CFR 265.55 | / | — | — | II |
| g.) Is coordinator familiar with all aspects of site operation and emergency procedures. 40 CFR 265.55 | / | — | — | II |
| h.) Does the Emergency Coordinator have the authority to carry out the Contingency Plan. 40 CFR 265.55 | / | — | — | II |
| i.) If an emergency situation has occurred at this facility, has the emergency coordinator followed the emergency procedures listed in 265.56. | / | — | — | I |
| j.) Has contingency plan been amended to reflect changes in regulations, plan failure, changes in the facility, list of emergency coordinators, changes in emergency equipment. 40 CFR 265.54 | / | — | — | II |

Comments: Cap. Outline of equip

INSPECTION FORM D

Yes	No	N/A	Violation Class
-----	----	-----	--------------------

2. Are copies of the contingency plan available at site and local emergency organizations. 40 CFR 265.53(a) 264.53(b)

II

Comments: _____

USE OF MANIFEST SYSTEM
Rule 601(2)(b)

1. Does this facility receive hazardous waste accompanied by a manifest. If yes, complete the following: *No*

- a.) Are copies signed and dated.

I

Rule 608(1)(a)

- b.) Are significant discrepancies noted on the manifest.
Rule 608(1)(b)

I

- c.) Are transporters given 1 copy of the signed manifest.
Rule 608(1)(c)

I

- d.) Are copies sent to the generator within 30 days. Rule 608(1)(d)

I

- e.) Are copies of the manifest retained for 3 years.

I

- f.) Are copies of the manifest returned to DNR within 10 days after end of month. Rule 608(1)(f)

II

Comments: _____

INSPECTION FORM D

<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Violation Class</u>
------------	-----------	------------	------------------------

2. Does this facility ship hazardous waste off-site. If yes, complete Generator Appendix. Rule 608(3)

<u>✓</u>	<u> </u>	<u> </u>	<u>N/A</u>
----------	-----------	-----------	------------

Comments: _____

3. For unreconciled significant discrepancies in manifests has the Director been notified. Rule 608(4)

<u>have noted</u>	<u> </u>	<u> </u>	<u>I</u>
-------------------	-----------	-----------	----------

Comments: _____

RECORDKEEPING

Rule 601(3) 40 CFR 265. Subpart E

1. Does the owner or operator of this facility maintain an operating record? Rule 609(1)

<u> </u>	<u> </u>	<u> </u>	<u>II</u>
-----------	-----------	-----------	-----------

Comments: maintained list of manifests and shipments shown

info at main office

2. Does this operating record contain:
265.73

- a.) The method(s) and date(s) of each waste's treatment, storage, or disposal as required in 40 CFR Part 265.73(b)(1) Appendix E

<u> </u>	<u> </u>	<u> </u>	<u>II</u>
-----------	-----------	-----------	-----------

INSPECTION FORM D

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Violation Class</u>
b.) The location and quantity of each hazardous waste within the facility? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.) 265.73(b)(2)	—	—	—	II
c.) If this facility disposes of hazardous waste on-site, is there a map or diagram of disposal area. 265.73(b)(2)	—	—	✓	II
d.) Records and results of all waste analyses, trial tests, monitoring data, and operator inspections? 265.73(b)(3)	—	—	—	II
e.) Reports detailing all incidents that required implementation of the Contingency Plan? 265.73(b)(4)	—	—	—	II
f.) Records and results of inspections as required in 40 CFR 264.15(d) 265.73(b)(5)	—	—	—	II
g.) <u>If required</u> , monitoring, testing, or analytical when required by construction permit or operating license. Rule 265.73(b)(6)	—	—	—	II
h.) Closure and post closure cost estimates. 265.73(b)(7)	—	—	—	II
Comments: <u>Closure / post closure to be determined per outstanding</u> <u>compliance order.</u>				
3. Are all required records available and maintained for at least 3 years. 265.74(3)	—	—	—	II

INSPECTION FORM D

Comments: _____

Yes No N/A Violation
Class

REPORTING

1. Has the owner or operator submitted a biennial report to the required administration by March 1 of even numbered years? 265.75

II

Comments: Yes

2. If applicable, for TSD's that receive hazardous waste from off-site sources. Rule 265.76

I

- a.) Has the facility accepted any hazardous waste from an off-site generator subject to Rule 205 without a manifest or shipping paper?

I

- b.) If "a" is yes, provide the identity of the source of the waste and a description of the quantity, type, and date received for each unmanifested hazardous waste shipment.

I

USE AND MANAGEMENT OF CONTAINERS Drums/Roll-off Boxes/Gondolas

1. Is hazardous waste accumulated in containers? If no, skip to tank section. ✓

N/A

2. a.) Is each container clearly marked with accumulation date and hazardous waste number Rule 306(1)(c) If no, how many _____

I

INSPECTION FORM D

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Violation</u> <u>Class</u>
b.) Has more than 90 days elapsed since date marked (Operating license needed as required in Part 5 of Rules) If yes, how many drums _____ Accumulation dates _____	_____	_____	_____	I _____
c.) Is each container labeled or marked clearly with the words "Hazardous Waste" rule 306(c). If no, how many _____	_____	_____	_____	I _____
d.) Are containers in good condition Rule 306(1)(a), 40 CFR 265.171. If no, specifically what is their conditions. _____	_____	_____	_____	I _____
e.) Are containers compatible with waste in them. RULE 306(1)(a) 40 CFR 265.172. If no, explain _____	_____	_____	_____	I _____
f.) Are containers stored closed, Rule 306(1)(a), 40 CFR 265.173(a) If no, how many _____	_____	_____	_____	I _____
g.) Are containers managed to prevent leaks? Rule 306(1)(a), 40 CFR 265.173(b) If no, explain _____	_____	_____	_____	I _____
h.) Are containers inspected weekly for leaks and defects? Rule 306(1)(a) 40 CFR 265.174.	_____	_____	_____	I _____
i.) Are ignitable and reactive wastes stored at least 15 meters (50 Feet) from property line? (Indicate if waste is ignitable or reactive) Rule 306(1)(a) 40 CFR 265.176. If no, explain _____	_____	_____	_____	I _____
j.) Are incompatible wastes stored in separate containers (If not the provisions of 40 CFR 265.17(b) apply) Rule 306(1)(a) 40 CFR 265.176. If no, explain _____	_____	_____	_____	I _____

INSPECTION FORM D

	Yes	No	N/A	Violation Class
--	-----	----	-----	--------------------

- k.) Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance? Rule 306(1)(a) 40 CFR 265.177.

I

Comments: no containers currently on site 4x4
containment pad empty.

3. If storing free liquid, does hazardous waste storage area include: rule 306(1)(a) 40 CFR 264.175.

- a.) Impervious base free of cracks. 40 CFR 264.175(b)(1)

I

- b.) Containment capable of holding 10% of volume of containers or 10% of largest container whichever is greater.

I

Comments: _____

4. Is hazardous waste being accumulated at the point of generation, Rule 306(2)

N/A

If yes:

- a.) Is container less than 55 gallons or one quart of acutely hazardous waste? Rule 306(2)

I

- b.) Is container under control or operator and near point of generation and under control of operator? Rule 306(2)

I

- c.) Are containers in good condition? Rule 306(2) 40 CFR 265.171

I

INSPECTION FORM D
Violation
Class

- | | Yes | No | N/A | Class |
|---|-----|----|-----|-------|
| d.) Are containers compatible with waste in them? Rule 306(2) 40 CFR 265.172 | — | — | — | I |
| e.) Are containers stored closed when not in use and managed to prevent leaks? Rule 306(2) 40 CFR 265.173 | — | — | — | I |
| f.) Are containers marked with the words "Hazardous Waste" and waste number (or other words that identify the contents) Rule 306(2) | — | — | — | I |

Comments: filtered material from WC placed in plastic lined
fiberglass-lined on regular basis to Buss.

TANKS

- | | | | | |
|--|-----|---|---|-----|
| 1. Is hazardous waste accumulated in tanks?
If no, skip to c. | ✓ | — | — | N/A |
| a.) Is each tank labeled or marked with the words "Hazardous Waste", Rule 306(1)(a), 40 CFR 252.34(a) | ✓ | — | — | I |
| b.) Are tanks used to store only those wastes which will not cause corrosion, leaking or premature failure of the tank? Rule 306(1)(a), 40 CFR 262.192(b). | ✓ | — | — | I |
| c.) Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structure. Rule 306(1)(a), 40 CFR 265.192(c)? | — | — | ✓ | I |
| d.) Do continuous feed systems have a wastefeed cutoff? Rule 306(1)(a), 40 CFR 265.192(d). | — | — | ✓ | I |
| e.) Are required daily and weekly inspections done? Rule 306(1)(a), 40 CFR 265.194? | not | — | — | II |

INSPECTION FORM D

Yes	No	N/A	Violation Class
-----	----	-----	--------------------

f.) Are reactive and ignitable wastes in tanks protected or rendered non-active or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements. 261.21 or 261.23 Rule 306(1)(a), 40 CFR 265.199

II

g.) Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.) Rule 306(1)(a), 40 CFR 265.199.

I

h.) Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reactive wastes? Rule 306(1)(a) 40 CFR 198 (3)(b)

I

Tank capacity: _____ gallons

Tank diameter: _____ feet

Distance of tank from property line _____ feet.

(See tables 2-1 through 206 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

Comments: all inspections within mostly areas in

use constantly subjected to personnel passing by.

2. Do above ground tanks have a 150% containment area constructed of impervious material, or if tanks hold incompatible wastes is each tank structurally enclosed? Rule 615(3)

I

INSPECTION FORM D

Yes	No	N/A	Violation Class
-----	----	-----	-----------------

Comments: _____

3. Do owners and operators of underground tanks do all the following:

- a.) Provide secondary adequate containment and leachate collection system. Rule 615(4)(a)
- b.) Conduct an inventory of the contents of the tanks at least twice a month. rule 615(4)(b)
- c.) Conduct leachate sampling at least once a year. Rule 615(4)(c)
- d.) Maintain an accurate inventory of the tank. Rule 615(4)(d)

_____	_____	_____	I
_____	_____	_____	I
_____	_____	_____	I
_____	_____	_____	I

Comments: _____

4. Is hazardous waste accumulated in other than tanks or containers? If yes, explain _____

_____	_____	_____	N/A
-------	-------	-------	-----

Comments: _____

INSPECTION FORM D

CLOSURE AND POST CLOSURE (Part 265 Subpart G)
 Part 7 of Act 64 Rules

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Violation Class</u>
1. Closure 265.112				
a.) Is the facility closure plan available for inspection?	—	—	—	I
b.) Does the plan identify				
i. maximum extent unclosed during facility life?	—	—	—	I
ii. maximum hazardous waste inventory?	—	—	—	I
iii. estimated year of closure	—	—	—	I
iv. schedule of closure activities	—	—	—	I

Comments: under review

*2. Post-Closure 265.118 - Act 64 Rules

a.) Is the post-closure plan available for inspection?	—	—	—	I
b.) Does this plan contain:				
i. description of groundwater monitoring activities and frequencies?	—	—	—	I
ii. description of maintenance activities and frequencies for				
AA. integrity of cap. final cover, or containment structures, where applicable.	—	—	—	I
BB. facility monitoring equipment.	—	—	—	I

INSPECTION FORM D

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Violation</u> <u>Class</u>
iii. name, address, and phone number of person or office to contact during post- closure care period?	_____	_____	_____	I _____
c.) Has the post-closure period begun?	_____	_____	_____	N/A _____
d.) Is the written post-closure cost estimate available? 265.144	_____	_____	_____	I _____

Comments: _____

* Applies only to disposal facilities.

GENERATOR APPENDIX

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Violation</u> <u>Class</u>
f.) The total quantity of waste(s) and the type and number of containers loaded. Rule 304(1)(f)	<u>/</u>	<u>—</u>	<u>—</u>	<u>II</u>
g.) Hazardous waste number describing the wastes. Rule 304(1)(g)	<u>/</u>	<u>—</u>	<u>—</u>	<u>II</u>
h.) Certification as required in Rule 304(1)(h)	<u>/</u>	<u>—</u>	<u>—</u>	<u>II</u>
i.) Signatures as required in Rule 304(4)	<u>/</u>	<u>—</u>	<u>—</u>	<u>I</u>
j.) Waste minimization program/certification	<u>/</u>	<u>—</u>	<u>—</u>	<u>I</u>

Comments: ASession - same dating not done

3. Reportable exceptions. Rule 308(3), 40 CFR 262.42

a.) For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has <u>NOT</u> received a signed copy from the designated facility within 35 days of the date of shipment. <u>NA</u>	<u>—</u>	<u>—</u>	<u>—</u>	<u>I</u>
b.) For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administrator.	<u>—</u>	<u>—</u>	<u>—</u>	<u>—</u>

Comments: _____

Yes No N/A Violation
Class

GENERATOR APPENDIX

Section A: Scope

Complete this Appendix if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

Manifest Requirements

1. a.) Does the generator have copies of the manifest available for review and on-site. 282.40 II
- b.) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period.

Comments: _____

Do the manifest forms examined contain the following information (If so, make copies of, or record information from manifests that do not contain the critical elements:

- a.) Manifest document number (Rule 304(2)(a)? II
- b.) The generator's name, mailing address, telephone number, and EPA Identification number. Rule 204(2)(b) II
- c.) The name and EPA ID number of transporter. Rule 304(2)(c) II
- d.) Name, address, and EPA ID number of designated permitted facility and alternate facility. Rule 304(2)(d) II
- e.) The description of waste(s) (DOT shipping name, DOT hazard class, DCT identification number. Rule 304(2)(e) II

4. line
BoF

3-14-86

I. Installation: Rouge Steel Company, Dearborn, MI
EPA ID.#: MID 087 738 431
Check Either: ☒ ~~Major Installation~~ Mandatory Inspection
☐ Non-Major Installation

Installation Activities:

☐ Generator
☐ Transporter
☒ Treatment/Storage/Disposal Facility

Authorized State?: ☐ Yes ☒ No

II. Inspector: Maggie Field's
Organization: Michigan Dept. of Natural Resources
Telephone: (313) 459-9180

III. Evaluator: Laura Lodisio
Organization: U.S. EPA - Region IV
Telephone: (312) 886-7090

IV. Date of Inspection: 03/14/86 Time: (from) 9:00 (to) 5:30

V. Inspection Evaluation

A) Pre-Inspection Preparation

Yes

No

Remarks

1) Did the inspector have a complete set of RCRA regulations with him?

☒

2) Did the inspector review the Part A application or effective permit before beginning the inspection?

☒

Maggie had reviewed file and summarized it for me previous to insp. We reviewed the violations cited in last insp.

PLEASE FORWARD A COPY OF THE FRONT SHEET ONLY OF THIS EVALUATION FORM WITHIN 5 DAYS FROM THE DATE OF INSPECTION TO Ken Skahn, SHW, STU #2. (THE ORIGINAL SHOULD GO TO THE STATE COMPLIANCE OFFICER FOR ENTRY INTO HWDMS AND FILING IN THE INSTALLATION COMPLIANCE FILE.)

Yes No Remarks

- 3) Did the inspector have the appropriate personal safety equipment?

✓ Hard hat, safety shoes, safety glasses.

B) Owner/Operator Interview

- 1) Did the inspector present an identity document showing the authority to perform RCRA inspections?

_____ Maggie had conducted inspections at the site on several previous occasions and knew the Co. representatives. They recognized Maggie immediately.

- 2) Did the inspector advise the owner/operator of the purpose of the inspection and briefly describe the agenda?

✓ _____

- 3) Was the inspector helpful to the owner/operator by giving explanations and guidance?

✓ - Maggie appeared knowledgeable on the regs. and was able to offer explanations & answer Q's. as the arose throughout the discussion. There was a detailed discussion re: alternate methods of disposal & re-use of pickle liquor & the status of local disposal facilities used by Rouge.

C) Document Inspection

- 1) Documents reviewed by the inspector:

- a) Part A application or issued permit

✓ _____

- b) Operator inspection log and schedule

✓ For each individual wastestream.

- c) Personnel training record

✓ Maggie reviewed this in detail offering suggestions/recommendations. Discussion of interaction of "Right to Know" training requirements.

- d) Operating record

✓ Reviewed for adequacy regarding each wastestream.

- e) Contingency plan

✓ _____

- f) Waste analysis plan,

✓ - At the time of inspection, there was some question on the applicability of RCRA to the treatment prior to UIC discharge and whether the closure/financial regs apply. Maggie will get clarification & follow up.

- g) Closure & Post Closure plan

_____ Manifests for ea. waste stream kept in separate locations on site.

- h) Financial Instruments

_____ _____

- i) Manifests

✓ _____

- j) Ground Water Monitoring Reports

_____ N.A. - No G.W. monitoring at this time.

- k) Other _____

_____ _____

	Yes	No	Remarks
2) Were documents reviewed thoroughly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
D) Facility Inspection			
1) Did the inspector observe all required items and correctly record the observations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
2) Did the inspector ask pertinent questions regarding the processes and wastes management practices used at the facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	In fact, through the insp. & by asking pertinent questions Maggie discovered several waste mgmt. waste handling areas which Co. had not informed us of.
3) Did the inspector ask questions about non-regulated activities of the facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	There was discussion of handling of non-hazardous liquids & other wastes as well as RCRA regulated streams
4) Did the inspector identify any activities which are regulated but not on the Part A or Permit?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Surface impoundment for treatment of K087.
E) Knowledge of the Regulations			
1) Was the inspector knowledgeable of RCRA regulations applicable to the facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
2) Was the inspector aware of recent amendments to the regulations that may affect the conduct of this inspection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Though none of the current Haz. Waste activity was directly effected by the new amendments, there was discussion of the new waste oil blage & how it would effect the waste oil surf. impoundment.
3) Was the inspector able to answer questions accurately?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4) Did the inspector commit to get answers to questions that couldn't be answered during the inspection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Re: UIC filters as treatment.
F) Completion of Inspection Forms			
1) Did the inspector fully complete the inspection forms during the inspection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

Yes

No

Remarks

- 2) Did the inspector make adequate use of written comments to clarify the report?

✓

In detail

- 3) Were the inspector's comments factual observations rather than opinion?

✓

- 4) Does the inspector's report accurately reflect your observations at the facility?

✓

G) Remarks

- 1) What is your overall assessment of the inspection and the inspection report?

Overall, I think that this inspector did an above-average and very thorough inspection of this facility considering the size of the facility and the number of wastestreams generated. She was extremely well-organized & systematic throughout both the document review and plant tour in keeping the waste streams separate. I think Maggie obtained the information necessary to evaluate compliance and gave clear, accurate explanation to facility re: what the violations were and what were problem areas. She held

- 2) What, if anything, would you recommend that the inspector do differently?

The only thing I might do differently is to schedule this inspection for several days, breaking down the areas or documents to be inspected in order to allow more time. This is not always possible, however, and it loses the impact of a surprise inspection. Also, Maggie chose this time, to complete the insp in one day because the EPA oversight was being conducted.

- 3) Additional remarks from other sections:

An exit interview at the termination of the plant tour to discuss w/ the environmental depts. about the problems / violations found during the inspection and to answer any questions regarding those violations. She clearly itemized the violations and explained what type of response would be expected to resolve them. She stressed the seriousness of several of the violations found - (i.e. - Surface impoundment operating w/o interim status or permit) and explained what types of actions may be required as well as possibility of escalated enforcement action.

3-14-86

RCRA INSPECTION REPORT

EPA Identification Number: MI D 087738431
Installation Name: ROUGE STEEL Co
Location Address: 3001 MILLER RD
City: DEARBORN State: M. 48121
Date of Inspection 3/14/86 Time of Inspection (from) 9:30 (to) 5:30
Person(s) Interviewed _____ Title _____ Telephone NO LUNCH BRK

GERALD DOROSHEWITZ
RUDOLPH DAWSON

SUPR/ENVIR CONTROL (313) 323-1260
ENVIRN ENGR " "

Inspector(s)	Agency/Title	Telephone
<u>MARGARET FIELD'S</u>	<u>MDNR/EQA</u>	<u>(313) 459-9180</u>
<u>LAURA LODISIO</u>	<u>USEPA/</u>	<u>(312) 886-7090</u>

Installation Activity (mark only one box)

<input checked="" type="checkbox"/> Treatment/Storage/Disposal per 40 CFR §265.1 and/or Generation and/or Transportation	A
<input type="checkbox"/> Treatment/Storage/Disposal (No Generation or Transportation)	A
<input type="checkbox"/> Generation and Transportation	B,C
<input type="checkbox"/> Generation Only	B
<input type="checkbox"/> Transportation Only	C

Inspection Form(s) _____

Hot Strip Vlt - Waste let depth - D001

Waste Acid **2** - Not matched - March/Apr 85

44 MI 0574973
3/22 0574854

Confidence
→ 350 lbs "seals"
→ 2 leaking drums
→ 4 waste M.S.

✓ Elbe Furman
BGF
Shapara

✓ Key Waste in War # Truck

will be dated
open in front
✓ spillage

✓ Signs on old/new target boards & etc

✓ Wall - 50/5/1 - 5/5/1 - 5/5/1

✓ wall - 50/5/1 - 5/5/1 - 5/5/1

DEPARTMENT OF NATURAL RESOURCES

HAZARDOUS WASTE DIVISION

FIELD REPORT

☐ Complaint Inspection
☐ Compliance Inspection
☐ PEAS Investigation
☐ PCB Report/Complaint

☐ Act 64 _____
☐ Act 136 _____
☐ Act 245 _____
☐ RCRA _____

Company/Facility		Date	Time
ROUGE STEEL		HISTORY	
3001 MILLER RD		Facility No.	MED 087738431
City		Staff	FIELD'S
DEARBORN			
Participants			
REMARKS: FILE SUMMARY			
8/11/80	Company filed an EPA Notification Form for GENERATOR / TSD & UNDERGROUND INJECTION		
11/17/80	Company filed a Part A only for the injection well.		
9/10/81	MDNR letter returning 197 manifests because they had not been appropriately signed. Company was advised to contact Lansing MDNR if they had any questions regarding manifest procedures.		
Jan/82	Waste Characterization Reports were filed for:		
	4013 Asbestos pipe insulation - Power & Utility		
	4013 Asbestos gasket material - Plant & Equipment		
	D003 Coke Oven Drips water - Iron Making Op.		
	D003 Final Cooler waters - Iron Making Op.		
	K087 Decanter Tank Tar Sludge - Iron Making Op.		
	D003 Light Oil Muck - Iron Making Op.		
	D001 (Now F003) Light Oil Tank Sludge - Iron Making Op.		
	K061 Electric Furnace Dust - Melting Op.		
2/19/82	MDNR Notice of Violation - The facility was illegally disposing of hazardous waste leachate from the Allen Park Way landfill.		

Distribution: Original — District File
 1st Copy — Lansing
 2nd Copy — Other

8/5/82

Notice from Rouge Steel that effective Jan 1, 1982, the Ford Motor Steel Div became the Rouge Steel Company.

9/20/82

The site's first RCRA Inspection Participants - Doroshewitz, Porter of Ford, and Norton of MDNR. The inspector clearly thought that the only regulated areas on site were the injection wells. In fact, the inspector wrote that the generator inspection segment of the form was, "Not applicable - No Off-Site Disposal".

10/19/82

MDNR letter to company regarding inspection results. No signs on the injection wells. Letter makes clear the only area under review were the wells. Company was sent a copy of the inspection report with the letter. Company letter states signs were posted. The company never advised the inspector that the report was in error or that any other wastes were generated.

10/22/82

11/12/82

MDNR letter stating the injection wells were in compliance.

11/29/82

1/26/83

MDNR letters regarding manifesting errors.

9/21/83

2nd RCRA Inspection

Participants Weber-Ford & Norton-DNR

This inspection was a repeat of the first. It addressed only the injection wells and noted again that the site was not a generator of hazardous waste which was totally incorrect yet was not corrected by the company. MDNR letter that the wells were in compliance.

10/19/83

10/8, 10/84

3rd RCRA Inspection

Participants Ford-Dorosheewitz, & Porter MDNR-Field's & Hubuckon.

Partly by accidently observing waste hauler activity and partly from familiarity with the business, questions were asked that identified an extensive generation of wastes. The site was in serious non compliance in several areas. MDNR letter to company summarizing the inspection.

10/15/84

11/15/84

Company letter and several attachments in response.

3/29/85

MDNR letter of warning to the company because they had not submitted a closure plan as requested.

4/15/85

MDNR (DAMREL) notes in file summarizing a phone conversation with Ford's Tom Webber and EPA's Pat Vogtman. It was agreed that Rouge operated only an injection well and therefore was exempt from the closure plan requirement. A letter retracting the letter of warning ~~was to~~ be issued.

4/22/85

EPA letter withdrawing letter of warning

5/21/85

Reinspection (5/7/85) letter on the non compliance areas cited during October 84 RCRA Inspection.

Some unfinished work, but tentatively considered in compliance.

7/2/85

MDNR (DAMREL) letter withdrawing request for closure plan.

10/30/85

Company letter with attached revised emergency plan. It had been improved significantly but still had some weak spots.

11/04/85

Company letter to EPA for Interim Status Certification
4th RCRA Inspection.

3/14/86

Discussed in attached papers.

INSPECTION FORM A

Section A: SCOPE OF INSPECTION.

1. Interim status standards for treatment storage or disposal of HAZARDOUS WASTES SUBJECT TO 40 CFR 265.1. Complete Inspection Form A sections B, C, D, E, and G.
2. Place an "X" in the box(es) corresponding to the facility's treatment, storage and disposal processes, and generation and/or transportation activity (if any). Complete only the applicable sections and appendixes.

Permit application process(es) (EPA Form 3510-3) Inspection Form A section(s)

S01	<input type="checkbox"/>	storage in containers	
S02	<input type="checkbox"/>	storage in tanks	J
T01	<input type="checkbox"/>	treatment in tanks	J
S04	<input type="checkbox"/>	storage in surface impoundment	K,F
T02	<input type="checkbox"/>	treatment in surface impoundment	K,F
D83	<input type="checkbox"/>	disposal in surface impoundment	K,F
S03	<input type="checkbox"/>	storage in waste pile	L
D81	<input type="checkbox"/>	disposal by land application	M,F
D80	<input type="checkbox"/>	disposal in landfill	N,F
T03	<input type="checkbox"/>	treatment by incineration	O/P
T04	<input checked="" type="checkbox"/>	treatment in devices other than tanks, surface impoundments, or incinerators	Q

Other activities

GENERATOR ☒

TRANSPORTER ☐

APPENDIX GN

APPENDIX TR

3. Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.
4. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

Section B: GENERAL FACILITY STANDARDS: (Part 265 Subpart B)

YES NO NI* Remarks

1. Has the Regional Administrator been notified regarding: 265.12

a. Receipt of hazardous waste from a foreign source?

— X NA

b. Facility expansion?

— X NA

c. Change of owner or operator?

— — —

with the pickle liquor plan for it

→ 2. General Waste Analysis: 265.13

a. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?

X — —

b. Does the owner or operator have a detailed waste analysis plan on file at the facility?

X — —

c. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?

X — —

However these did not address any contained wastes, waste oils or cooling water filter mediums.

3. Security - Do security measures include: (if applicable) 265.14

a. 24-Hour surveillance?

X — —

b. i. Artificial or natural barrier around facility?
and

X — —

ii. Controlled entry?

X — —

c. Danger sign(s) at entrance?

— — X

→ 4. Owner or operator inspections: 265.15

a. Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors, and discharges of hazardous waste that may affect human health or the environment?

X — —

Add Tar Pits & New tole

*Not Inspected

YES NO NI Remarks

- b. Does the owner or operator have an inspection schedule at the facility?
- c. If so, does the schedule address the inspection of the following items:
- i. monitoring equipment?
 - ii. safety and emergency equipment?
 - iii. security devices?
 - iv. operating and structural equipment (i.e. dikes, pumps, etc.)?
 - v. type of problems to be looked for during the inspection (e.g. leaky fitting, defective pump, etc.)?
 - vi. inspection frequency (based upon the possible deterioration rate of the equipment)?
- d. Are areas subject to spills inspected daily when in use?
- e. Does the owner or operator maintain an inspection log or summary of owner or operator inspections?
- f. Does the inspection log contain the following information:
- i. the date and time of the inspection?
 - ii. the name of the inspector?
 - iii. a notation of the observations made?
 - iv. the date and nature of any repairs or remedial actions?

X

Two areas as TSD are Tar Pits & UIC - only equip. rep. are reportedly a shovel for tar & diking equip. for waters. Not approp. for this.

X

Reportedly by since spillage was allowed to sit for a week = obviously inadequate

5. Do personnel training records include: 265.16

- a. Job titles?
- b. Job descriptions?

Training is being expanded to include Right to Know & computerize personnel & training records will be completed this summer.

	YES	NO	NI	Remarks
c. Description of training?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>Coke But Acid inadequate Elec Fr</i>
d. Records of training?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
e. Did facility personnel receive the required training by 5-19-81?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
f. Do new personnel receive required training within six months?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
g. Do personnel training records indicate that personnel have taken part in an annual review of initial training?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed? 265.17				
a. Special handling?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>NA</i>
b. No smoking signs?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>NA</i>
c. Separation and protection from ignition sources?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>NA</i>

Section C: PREPAREDNESS AND PREVENTION: (Part 265 Subpart C)

1. Maintenance and Operation
of Facility: 265.31

YES NO NI Remarks

→ Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?

X

Tarpitch - see letter

2. If required, does the facility have the following equipment: 265.32

a. Internal communications or alarm systems?

X

Telephones
Areas near offices

b. Telephone or 2-way radios at the scene of operations?

X

c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?

Basic spill control - shovels
tractor etc & lime stone

Indicate the volume of water and/or foam available for fire control:

Access to city & river water

foam avail to all bypassed Tar area although
not HCLA flammable - gas line
drips questionable.

3. Testing and Maintenance of
Emergency Equipment: 265.33

a. Has the owner or operator established testing and maintenance procedures for emergency equipment?

—

The above equip
NA doesn't req
maint

b. Is emergency equipment maintained in operable condition?

—

NA

4. Has owner or operator provided immediate access to internal alarms? (if needed) 265.34

—

Alarm in light rail
area
Not needed

5. Is there adequate aisle space for unobstructed movement?

—

NA outdoors

6. Has the owner or operator attempted to make arrangements with local authorities in case of an emergency at the facility?

X

with recpts

YES NO NI Remarks

3. Emergency Coordinator 265.55

- a. Is the facility Emergency Coordinator identified?
- b. Is coordinator familiar with all aspects of site operation and emergency procedures?
- c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?

X — — —
X — — — *but needs lots of training*
X — — —

4. Emergency Procedures 265.56

If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?

NX — — *potential*
But had an acid tank leak handled according to plan
Noted during insp & repaired
Not followed for tar pitch handling.

Section D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES: (Part 265 Subpart D)

YES NO NI Remarks

1. Does the Contingency Plan contain the following information: 265.52

a. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)

X

*However not enforced
complied as tar pitch
handling not in
compliance with
requirements*

b. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?

X

c. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?

X

d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?

— — —

discussed as before

e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)

— — —

*Facility doesn't eff
wastes require this
& appars are
NA outdoor*

2. Are copies of the Contingency Plan available at the site and local emergency organizations? 265.53

X

w/ receipts

Section E: MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING: (Part 265 Subpart E)

YES NO NI Remarks

**** 1. Use of Manifest System 265.71**

a. Does the facility follow the procedures listed in §265.71 for processing each manifest? (Particularly sending a copy of the signed manifest back to the generator within 30 days after delivery.)

b. Are records of past shipments retained for 3 years?

Does not accept waste from off site

**** 2. Does the owner or operator meet requirements regarding manifest discrepancies? 265.72**

**** Not applicable to owners or operators of on-site facilities that do not receive any waste from off-site sources.**

3. Operating Record 265.73

a. Does the owner or operator maintain an operating record as required in 265.73?

b. Does the operating record contain the following information:

i. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in 40 CFR Part 265 Appendix I?

ii. The location and quantity of each hazardous waste within the facility? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)

***iii. A map or diagram of each cell or disposal area

*** only applies to disposal facilities

Section Q - CHEMICAL, PHYSICAL AND BIOLOGICAL TREATMENT (Part 265, Subpart Q)

	YES	NO	NI	Remarks
1. Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure? 265.401	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	at pump = 100' from well
3. Has the owner or operator addressed the waste analysis requirements of 265.402?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Are inspection procedures followed according to 265.403?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. Are the special requirements fulfilled for ignitable or reactive wastes? 265.405	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	No spec req. were identified - No acid in area
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.) 265.406	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristics under 40 CFR §261.22, or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason.

*This area is not clearly regulated as such & whether closure might be necessary. No storage / questionable whether filter cartridges are haz / how to reg. closure. Checked into Q-1
Considered exempt under 265.1(c)(9) 4/82-A
as a totally enclosed system.*

Appendix GN

Section A: Scope

1. Complete this Appendix if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

Section B: MANIFEST REQUIREMENTS (Part 262, Subpart B)

	YES	NO	NI	Remarks
(1) Does the operator have copies of the manifest available for review? 262.40	<u>X</u>			<u>But not for 3 yrs in Acid area</u>
(2) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period.				<u>2200 examined</u>
(3) Do the manifest forms examined contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements). 262.21				
a. Manifest document number?	<u>X</u>			
b. Name, mailing address, telephone number, and EPA ID number of Generator	<u>X</u>			
c. Name and EPA ID Number of Transporter(s)?	<u>X</u>			
d. Name, address, and EPA ID Number Designated permitted facility and alternate facility?	<u>X</u>			
e. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<u>X</u>			
f. The total quantity of waste(s) and the type and number of containers loaded?	<u>X</u>			
g. Required certification?	<u>X</u>			
h. Required signatures?	<u>X</u>			
(4) Reportable exceptions 262.42				
a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has NOT received a signed copy from the designated facility within 35 days of the date of shipment.				<u>2 To Waste Acid but was explained on site No problem</u>
b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administrator.				<u>NA</u>

Section C: PRE-TRANSPORT REQUIREMENTS (Part 262, Subpart C)

	YES	NO	NI	Remarks
Is waste packaged in accordance with DOT regulations? (Required prior to movement of hazardous waste off-site) 262.30	—	—	<u>X</u>	—
2. Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required for movement of hazardous waste off-site) 262.31 262.32	—	—	<u>X</u>	—
3. If required, are placards available to transporters of hazardous waste? 262.33	—	—	<u>X</u>	—
4. On-site accumulation of generated hazardous wastes. A HWMF may accumulate hazardous waste it generates either (A) in its storage facility [265.1(b)] or (B) in accordance with 40 CFR 262.34 [see 265.1(c)(7)]. Option B restricts all accumulation to tanks and containers. If the installation elects option A, check this box <input type="checkbox"/> and skip to Section D. If the installation elects option B, complete the following observations: See 40 CFR 262.34 January 11, 1982 Revision				
a. Is each container clearly marked with the start of accumulation date?	—	—	—	<i>could not be determined as observed containers had not been evaluated</i>
b. Have more than 90 days elapsed since the date inspected in (a)?	—	—	—	
c. Do wastes remain in accumulation tanks for more than 90 days?	—	—	—	
d. Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?	—	—	—	

Section D: - RECORDKEEPING AND REPORTING (Part 262, Subpart D)

	YES	NO	NI	Remarks
1. Are all test results and analyses needed for hazardous waste determinations retained for at least three years? 262.40	—	—	<u>X</u>	—

Section E: - INTERNATIONAL SHIPMENTS (Part 262, Subpart E)

1. Has the installation imported or exported Hazardous Waste? 262.50	—	—	<u>X</u>	—
(If answered Yes, complete the following as applicable.)				
a. Exporting Hazardous waste; has a generator:				

	YES	NO	NI	Remarks
i. Notified the Administrator in writing?			<input checked="" type="checkbox"/>	
ii. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?				
iii. Met the Manifest requirements?				
b. Importing Hazardous Waste; has the generator met the manifest requirements?				

INSPECTION FORM B
Part 3 Rules
P.A. 64 of 1979

GENERATOR INSPECTION FORM

(Generates 1000 kg per month or accumulates 1000 kg at any time)

- ☒ Drums (Containers)
☒ Above ground tank(s)
☐ Underground tank(s)
☒ Other Silo

HAZARDOUS WASTE CODE/NAME	SOURCE	WASTE STREAM(S) TYPE OF STORAGE	HOW MUCH
Foo 1	111 Tschbroth's - Methylen chloride	degreasing drums	irregular 1-2/yr
K061 Electric Arc Furnace Dust		Silo	2 loads/day
(K062) Pickle liquid	Tank - currently going for reuse to Eaglebrook NH		
D001 Mineral Spirits	Safety Kleen parts cleaners		

COMMENTS:

U002 - acetone - listed on notification - possibly off-spec
product - not regularly generated

Coke Oven Related Wastes - no longer generated (April 88)

D003 Coke oven drip water - 11 Tanks (6 above ground)

D003 Final cooled water - was disposed in MC well (now also closed)

K087 Coke oven Tar Sludge - was stored onsite, removed & cleaned per closure plan.

D008 Light Oil Muck - 2 Tanks.

WASTE EVALUATION (RULE 302)

INSPECTION FORM B

- | | Yes | No | N/A | Violation
Class |
|---|-------------------------------------|--------------------------|--------------------------|--------------------|
| 1. Has generator determined if waste streams are hazardous in accordance with Rule 302. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <u>I</u> |

Comments: _____

MANIFEST REQUIREMENTS (RULE 304)

- | | | | | |
|---|-------------------------------------|--------------------------|--------------------------|-----------|
| 2. a.) Does the generator have copies of the manifest available for review and onsite 262.40 | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <u>II</u> |
| b.) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period. | | | <u>~53 HW</u> | |

Comments: * Could not locate manifest for shipment of F
Series waste in drums (Tricklar)

- | | | | | |
|---|-------------------------------------|--------------------------|--------------------------|-----------|
| 3. Do the manifest forms examined contain the following information (If so, make copies of, or record information from manifests that do not contain the critical elements: | | | | |
| a.) Manifest document number (Rule 304 (2) (a)? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <u>II</u> |
| b.) The generator's name, mailing address, telephone number, and EPA Identification Number (Rule 304(a)(b) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <u>II</u> |
| c.) The name and EPA ID number of Transporter (Rule 304(2)(c) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <u>II</u> |
| d.) Name, address, and EPA ID number of designed permitted facility and alternate facility (Rule 304(2)(d) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <u>II</u> |

INSPECTION FORM B

	Yes	No	N/A	Violation Class
--	-----	----	-----	-----------------

e.) The description of waste(s) (DOT shipping name, DOT hazard class, DOT identification number, Rule 304(2)(e))

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	II
-------------------------------------	--------------------------	--------------------------	----

f.) The total quantity of waste(s) and the type and number of containers loaded Rule 304(2)(f)

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	II
-------------------------------------	--------------------------	--------------------------	----

g.) Hazardous waste number describing the wastes. Rule 304(2)(g)

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	II
-------------------------------------	--------------------------	--------------------------	----

h.) Certification as required in Rule 304(2)(h)

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	II
-------------------------------------	--------------------------	--------------------------	----

i.) Signatures as required in Rule 304(4)

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I
-------------------------------------	--------------------------	--------------------------	---

j.) Waste minimization program/certification.

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I
-------------------------------------	--------------------------	--------------------------	---

Comments: * Manifests for electric arc furnace dust missing document

136 Manifests from Hilina not being matched with TSDR copy and 2 MDNR copies located in file - analyzed the D003-#0955639

Reportable exceptions, Rule 308(3), 40 CFR 262.42

a.) For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has NOT received a signed copy from the designated facility within 35 days of the date of shipment.

I

b.) For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administrator.

Comments: a) could not be determined with 136 Manifests

INSPECTION FORM B
Violation
Class

Yes

No

N/A

Class

BIENNIAL REPORT

Rule 308

5. Has the generator submitted a biennial report by March 1 of even numbered years Rule 308(1) (copies of report must be retained at least 3 years)

II

COMMENTS:

Report filed as required & TSD for WIC

PRE-TRANSPORT REQUIREMENTS

Rule 305, 40 CFR 262 Subpart C.

6. Is waste packaged in accordance with DOT regulations (required prior to movement of hazardous waste off site) Rule 305(1)(a)

I

Comments:

Nothing currently being shipped

7. Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous materials (Required prior to movement of hazardous waste off-site) Rule 305(1)(b)(c)?

I

Comments:

See above

8. On containers of 110 gallons or less does the appropriate information displayed include a warning and generators name, address, manifest document number and waste code as required in 40 CFR 172, 304, Rule 305(1)(d)

I

	Yes	No	N/A	Violation Class
Comments: <u>No containers on site</u>				

9. If required, are placards available to the transporter, Rule 305(l)(e)		<u>N/A</u>		I
---	--	------------	--	---

Comments: _____

PRESHIPMENT ACCUMULATION
Drums/Roll-off Boxes/Gondolas

10. Is hazardous waste accumulated in containers? If no, skip to (13)	<u>✓</u>			N/A
--	----------	--	--	-----

a.) Is each container clearly marked with accumulation date and hazardous waste number Rule 306(l)(c). If no, how many _____				I
---	--	--	--	---

b.) Has more than 90 days elapsed since date marked (Operating license needed as required in Part 5 of Rules) If yes, how many drums _____ Accumulation dates _____				I
---	--	--	--	---

c.) Is each container labeled or marked clearly with the words "Hazardous Waste" rule 306(c) If no, how many _____				I
---	--	--	--	---

d.) Are containers in good condition Rule 306(l)(a), 40 CFR 265.171. If no, specifically what is their conditions. _____				I
---	--	--	--	---

e.) Are containers compatible with waste in them. Rule 306(l)(a) 40 CFR 265.172. If no, explain _____				I
---	--	--	--	---

f.) Are containers stored closed, Rule 306(l)(a), 40 CFR 265.173(a) If no, how many _____				I
--	--	--	--	---

INSPECTION FORM B
Violation
Class

- g.) Are containers managed to prevent leaks. Rule 306(1)(a) 40 CFR 265.173(b). If no, explain

Yes No N/A

I

- h.) Are containers inspected weekly for leaks and defects. Rule 306(1)(a) 40 CFR 265.174.

I

- i.) Are ignitable and reactive wastes stored at least 15 meters (50 feet) from property line? (Indicate if waste is ignitable or reactive) Rule 306(1)(a) 40 CFR 265.176. If no, explain

Maintaining in the logs.

I

- j.) Are incompatible wastes stored in separate containers. (If not the provisions of 40 CFR 265.17(b) apply) Rule 306(1)(a) 40 CFR 265.176. If no, explain

I

- k.) Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance? Rule 306(1)(a) 40 CFR 265.177.

I

Comments: *9/22-4/25 shipped*

shipped before 8-5-84 H. H. H. H. H.

11. Is hazardous waste being accumulated at the point of generation, Rule 306(2) If yes:

N/A

- a.) Is container less than 55 gallons or 1 quart of acutely hazardous waste? Rule 306(2)

I

- b.) Is container under control of operator and near point of generation Rule 306(2)

I

- c.) Are containers in good condition? Rule 306(2) 40 CFR 265.171.

I

- d.) Are containers compatible with waste in them? Rule 306(2) 40 CFR 265.172.

I

- e.) Are containers stored closed when not in use and managed to prevent leaks? Rule 306(2) 40 CFR 265.173.

I

INSPECTION FORM B

Violation

- | | Yes | No | N/A | Class |
|---|-----|----|-----|-------|
| f.) Are containers marked with the words "Hazardous Waste" and waste number (or other words that identify the contents Rule 306(2)) | | | | I |

Comments: There are no Hazardous waste drums on site to inspect

12. If storing free liquids, does hazardous waste storage area include:
Rule 306(1)(a) 40 CFR 264.175.

- | | | | | |
|---|-------------|-----------|-----------|---|
| a.) Impervious base free of cracks
40 CFR 264.175(b)(1) | * <u> </u> | <u> </u> | <u> </u> | I |
| b.) Containment capable of holding
10% of volume of containers or
10% of largest container whichever
is greater.
40 CFR 264.175(b)(2) | <u> </u> | <u> </u> | <u> </u> | I |

Comments: * company must demonstrate indication is
There is no coating on the base

TANKS

13. Is hazardous waste accumulated in tanks?
If no, skip to 16.
- | | | | | |
|--|-----------|------------|-----------|-----|
| | <u> </u> | <u>5/6</u> | <u> </u> | N/A |
| a.) Is each tank labeled or marked with the words "Hazardous Waste",? Rule 306(1)(a), 40 CFR 252.34(a) | <u> </u> | <u> </u> | <u> </u> | I |
| b.) Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank Rule 306(1)(a), 40 CFR 262.192(b) | <u> </u> | <u> </u> | <u> </u> | I |
| c.) Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structure Rule 306(1)(a), 40 CFR 265.192(c). | <u> </u> | <u> </u> | <u> </u> | I |

INSPECTION FORM B

	Yes	No	N/A	Violation Class
--	-----	----	-----	--------------------

d.) Do continuous feed systems have a waste-feed cutoff Rule 306(1)(a), 40 CFR 265.192(d).

I

e. Are required daily and weekly inspections done? Rule 306(1)(a), 40 CFR 265.194? ☒

f.) Are reactive and ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements. 261.21 or 261.23) rule 306(1)(a), 40 CFR 265.198? ☒

I

g.) Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.) Rule 306(1)(a), 40 CFR 265.199. ☒

I

h.) Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reactive wastes? Rule 306(1)(a) 40 CFR 198(3)(b). ☒

I

Tank capacity: _____ gallons

Tank diameter: _____ feet

Distance of tank from property line _____ feet.

(see tables 2-1 through 2-6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

Comments: 13 tanks related to cake ovens used for
90 day storage operation is currently shut down.
Tanks were pumped of liquid but not cleaned.

INSPECTION FORM B
Violation
Class

Yes No N/A

14. Do above ground tanks have a 150% containment area constructed of impervious material? Rule 615(3)?

I

Comments: See comment on previous page

15. Do owners and operators of underground tanks do all the following:

a.) Provide adequate secondary containment and leachate collection system? Rule 615(4)(a)

I

b.) Conduct an inventory of the contents of the tanks at least twice a month? Rule 615 (4)(b)

I

c.) Conduct leachate sampling at least once a year? Rule 615(4)(c)

I

d.) Maintain an accurate inventory of the tank? rule 615(4)(d)

I

See comment on previous page

Comments:

16. Is hazardous waste accumulated in other than tanks or containers? If yes, explain:

N/A

Comments:

INSPECTION FORM B

Yes	No	N/A	Violation Class
-----	----	-----	-----------------

PERSONNEL TRAINING

Rule 306(1)(d) 40 CFR 265.16

17. Do personnel training records contain the following:

a.) Job title 40 CFR 265.16(d)(1)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I
b.) Job description 40 CFR 265.16(d)(2)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I
c.) Description of training 40 CFR 265.16(d)(3)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I
d.) Records of training 40 CFR 265.16(d)(4)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	II
e.) Do new personnel receive required training within 6 months. 40 CFR 265.16(b).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I
f.) Do personnel training records indicate that personnel have taken part in an annual review of initial training. 40 CFR.16 (b)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I

Comments: Training completed March 88.

new staff should be trained - encouraged of fire
would be notified

PREPAREDNESS AND PREVENTIONRULE 306 (1)(d) 40 CFR 265. Subpart C

18. Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent 40 CFR Rule 265.31.

<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	I
--------------------------	-------------------------------------	--------------------------	---

Comments: _____

19. If required, does this facility have the following equipment: 40 CFR 265.32

INSPECTION FORM B

Violation

	Yes	No	N/A	Class
a.) Internal communications or alarm systems. 40 CFR 265.32(a)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I
b.) Telephone or 2-way radios at the scene of operations. 40 CFR 265.32(a)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I
c.) Portable fire extinguishers, fire control, spill control equipment and decontamination equipment. 40 CFR 265.32(c)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I
d.) Indicate the volume of water and/or foam available for fire control.	<u>city water</u>	<input type="checkbox"/>	<input type="checkbox"/>	N/A

Comments: _____

20. Testing and Maintenance of Emergency Equipment.

a.) Has the owner or operator established testing and maintenance procedures for emergency equipment. 40 CFR 265.33	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I
b.) Is emergency equipment maintained in operable condition? 40 CFR 265.33.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I
c.) Has owner/operator provided immediate access to internal alarms? (if needed) 40 CFR 265.34(a)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I
d.) Is there adequate aisle space for unobstructed movement for personnel and emergency equipment? 40 CFR 265.35	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I

Comments: Safety officer regularly reports

INSPECTION FORM B

Yes No N/A Violation
Class

CONTINGENCY PLAN AND EMERGENCY PROCEDURES
Rule 306(1)(d) 40 CFR 265 Subpart D

21. Does the contingency plan contain the following information:

- | | | | | | |
|-----|---|-------|-------|-------|----|
| a.) | The actions facility personnel must take to comply with 265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention Control and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable). 265.52 | _____ | _____ | _____ | I |
| b.) | Describe arrangements or attempts to make arrangements agreed to by local police departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to 40 CFR 265.52(c) 40 CFR 265.37. | _____ | _____ | _____ | II |
| c.) | Names, addresses, and phone numbers (Office and Home) of all persons qualified to act as emergency coordinator. 40 CFR 265.52(d) | _____ | _____ | _____ | II |
| d.) | A list of all emergency equipment at the facility which includes the location and physical description of each item on the list, and a brief outline of its capabilities. 40CFR265.52(e) ✓ | _____ | _____ | _____ | II |
| e.) | An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes and alternate evacuation routes?) 40 CFR 265.52(f). ✓ | _____ | _____ | _____ | II |

INSPECTION FORM B

	Yes	No	N/A	Violation Class
f.) Is the facility emergency coordinator identified? 40 CFR 265.55	/	—	—	II
g.) Is coordinator familiar with all aspects of site operation and emergency procedures? 40 CFR 265.55	/	—	—	II
h.) Does the Emergency Coordinator have the authority to carry out the Contingency Plan? 40 CFR 265.55	/	—	—	II
i.) If an emergency situation has occurred at this facility, has the emergency coordinator followed the emergency procedures listed in 265.56?	/	—	—	I
j.) Has the contingency plan been amended to reflect changes in regulations, plan factor changes in the facility, list of emergency coordinators, changes in emergency equipment. 265.54	/	—	—	II

Comments: Plan must be amended to include MDRR notification
on spills - Wayne County Air when an Release occurs
complaints of Rose July 10 - 18 + 20 1988 discussed.

22. Are copies of the Contingency Plan available at site and local emergency organizations. 40 CFR 265.53

/ — — — II

Comments: _____

INTERNATIONAL SHIPMENTS

Rule 309, 40 CFR 262.50

Has the installation imported or exported hazardous waste? If no, skip a and b.

N/A

for pickle liquor only - To Eaglebrook - not
Shipped as hazardous waste.

INSPECTION FORM B

Violation

<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Class</u>
------------	-----------	------------	--------------

a.) Exporting Hazardous Waste, has a generator:

i.) Notified the Administrator in writing? _____

I

ii.) Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country? _____

I

I

iii.) Met the Manifest requirements? _____

b.) Importing Hazardous Waste, has the generator met the manifest requirements? _____

I

Comments: _____

RCRA/ACT 64 INSPECTION REPORT

U.S. EPA I.D. NUMBER M 1 D 0 8 7 7 3 8 4 3 1
(or Michigan)

FACILITY NAME
(Mailing Address)

Rauge Steel Company
3001 Miller Rd.
Dearborn MICHIGAN 48121
CITY ZIP CODE

DATE September 21, 1988 TIME OF INSPECTION (FROM) 11:00 (TO) 12:30

PERSON(S) INTERVIEWED	TITLE	TELEPHONE
<u>Steve Landes</u>	<u>Environmental Engr.</u>	<u>323-1260</u>

INSPECTOR(S)	AGENCY/TITLE	TELEPHONE
<u>Lynne King</u>	<u>MDNR/WASTE MANAGEMENT</u>	<u>344-4670</u>

Primary Business of this Facility: Steel Manufacture

Reason for Inspection:

☒ Routine ☐ Follow-up ☐ Complaint

INSPECTION FORMS:

FORM

Based upon the inspection, this facility:

- ☐ is a non-generator/conditionally exempt small quantity generator
- ☐ small quantity generator
- ☒ generator
- ☐ transporter
- ☐ treatment/storage/disposal facility

A
A
B
C
D

Date of Last Inspection March 30, 1987

RCRA LAND DISPOSAL RESTRICTION INSPECTION

GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

A. BDAT Treatability Group - Treatment Standards Identification

1. F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

☒ Yes ☐ No ☐ NA *Based on
characterization*

If yes, check the appropriate treatability group.

- ☐ Wastewaters containing solvents (less than or equal to 1% TOC by weight)
☐ Pharmaceutical wastewater containing
☒ spent methylene chloride
☐ All other spent solvent wastes

2. California List Wastes: Does the generator correctly determine the appropriate treatment standard of the waste?

- a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

☐ Yes ☐ No ☒ NA

If yes, specify the method: _____

- b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated or disposed of by other approved alternate methods (40 CFR 761.60 (e))?

☐ Yes ☐ No ☐ NA

If yes, specify the method and state whether the facility has submitted a written request to the Regional Administrator or Assistant Administrator for an exemption from the incineration requirement:

B. Waste Analysis

1. F-Solvent Wastes

- a. Does the generator determine whether the F-solvent waste exceeds treatment standards?

☒ Yes ☐ No ☐ NA

How was this determination made?

- Knowledge of waste

☒ Yes ☐ No

If yes, note how this is adequate: Burnah - same
materially - prequal from TSD

- TCLP

☐ Yes ☒ No

If yes, provide the date of last test, the frequency of testing, and note any problems. Attach test results.

- b. Does the F-solvent waste exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]?

☒ Yes ☐ No ☐ NA

If yes, specify the waste stream: degreasing

- c. Does the generator dilute the F-solvent waste as a substitute for adequate treatment [268.3]?

☐ Yes ☒ No ☐ NA

- d. How does the generator test F-solvent waste when a process or waste stream changes?

no changes have occurred

2. California List Wastes

- a. Does the generator determine whether the waste is a liquid according to the Paint Filter Liquids Test (PFLT method 9095) as described by SW-846?

☐ Yes ☒ No ☐ NA

- b. If the waste is determined to be a liquid according to PFLT, is an absorbent added to the waste?

_____ Yes _____ No _____ NA

What type of absorbent is used? _____
Check the types of waste to which absorbent is added.

- _____ Liquid hazardous waste having a pH less than or equal to 2
- _____ Liquid hazardous waste containing HOCs in concentrations greater than or equal to 1,000 mg/L, but less than 10,000 mg/L
- _____ Liquid hazardous waste containing metals
- _____ Liquid hazardous waste containing free cyanides

- c. Does the generator determine whether the concentration levels (not extract or filtrate) in the waste equal or exceed the prohibition levels or whether the waste has a pH of less than or equal to 2.0 based on:

- Knowledge of wastes

_____ Yes _____ No _____ NA

If yes, note how this is adequate: _____

- Testing

_____ Yes _____ No _____ NA

If yes, list test method used: _____

- d. Does the generator determine if concentration levels in PFLT extract exceed cyanide and metals concentration levels?

_____ Yes _____ No _____ NA

- If yes, list test method used and constituent and concentration levels that exceeded prohibition levels: _____

- e. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

_____ Yes _____ No _____ NA

C. Management

1. On-Site Management

Is waste that exceeds the treatment standards treated, stored, or disposed on-site?

_____ Yes ☒ No

If yes, the TSD Checklist must be completed.

2. Off-Site Management

- a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?

☒ Yes _____ No

If yes, does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?

_____ Yes _____ No

If yes, does notification contain the following?

EPA Hazardous waste number(s) _____ Yes _____ No

Applicable treatment standards _____ Yes _____ No

Manifest number _____ Yes _____ No

Waste analysis data, if available _____ Yes _____ No

Identify off-site treatment or storage facilities: _____

- b. Does the generator ship any waste that meets the treatment standards to an off-site disposal facility?

_____ Yes _____ No

If yes, does the generator provide notification and certification to the disposal facility [268.7(a)(2)]?

_____ Yes _____ No

If yes, does notification contain the following?

EPA Hazardous waste number(s)	_____ Yes	_____ No
Applicable treatment standards	_____ Yes	_____ No
Manifest number	_____ Yes	_____ No
Waste analysis data, if available	_____ Yes	_____ No
Certification that the waste meets treatment standards	_____ Yes	_____ No

Identify off-site land disposal facilities: _____

- c. If the waste is subject to a nationwide variance (e.g., solvent-water mixtures less than 1%), extension (268.5), or petition (268.6), does the generator provide notification to the off-site disposal facility that the waste is exempt from land disposal restrictions [268.7(a)(3)]?

_____ Yes _____ No _____ NA

D. Treatment Using RCRA 264/265 Exempt Units or Processes
(i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)

Are treatment residuals generated from units or processes exempt under RCRA 264/265?

_____ Yes _____ No

If yes, list types of waste treatment units and processes:
